

### **REMARKS**

Applicants have now had an opportunity to carefully consider the Examiner's comments set forth in the Office Action of April 19, 2005.

Reconsideration of the Application is requested.

### **The Office Action**

Claims 1, 3 – 9, 16 – 19 and 22 remain in this application. Claims 2 and 20 – 21 have been canceled.

Claims 1 – 4, 6 – 9 and 16 – 20 stand rejected under 35 U.S.C. § 102(e) as being anticipated by Owa et al. (U.S. Patent No. 6,348,971).

Claims 2, 5, 10 – 15 and 21 – 22 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Owa et al. in view of Smirnov et al. (U.S. Patent No. 6,546,364).

### **Summary of Telephonic Interview**

Applicants acknowledge and appreciate the time and courtesy Examiner Thierry L. Pham extended in participating in a telephone interview held May 18, 2005. The interview is summarized herein.

In the interview, the applicants indicated that amending claim 1 with the subject matter of claim 2, specifically adding the limitation of defining "resources" as equipment for performing printing tasks including printers, copiers, rollers, shrink wrappers, cutters, sealers and manual resources patentably distinguishes over the cited reference, namely Owa (U.S. Patent No. 6,348,971).

Also, the applicants indicated that amending independent claim 16 to include the limitations of dependent claims 20 and 21 distinguishes over the cited prior art. It was also noted by Examiner Pham that including the limitation of "virtual" autonomous cells to the independent claims, patentably distinguishes the claims over the primary reference, Owa.

### **Comments/Arguments**

Claims 2, 10 – 15 and 20 – 21 have been canceled without prejudice or disclaimer of the subject matter contained therein.

As to independent claim 1 and claims 3 – 9 which depend therefrom all rejections are hereby traversed. Claim 1 has been amended to include the limitation

that “resources” include equipment for performing printing tasks such as printers, copiers, rollers, shrink wrappers, cutters, sealers and manual resources among others. Claim 1 has been further amended to include the limitation of “virtual” autonomous cells. The Office Action asserts that Owa et al. anticipates claim 1 of the present application. However, the applicants submit that Owa et al. fails to teach or fairly suggest partitioning a printshop into virtual autonomous cells. Partitioning a printshop into autonomous cells comprises configuring and/or organizing, including moving, grouping, adding and deleting the resources of the printshop in and/or from the autonomous cells so as to attain the most efficient and cost effective configuration of cells. Owa et al. does not partition the printshop into autonomous cells, Owa et al. maps print jobs onto an existing configuration of printers. This is not the same as partitioning or configuring the printshop into autonomous cells where resources can be reconfigured and/or repartitioned to more efficiently handle a possible change in the workflow of the printshop. Owa et al. fails to teach or fairly suggest reconfiguring the autonomous cells, rather Owa et al. discloses a remapping of print jobs on an existing layout of printers.

For at least these reasons, independent claim 1 and claims 3 – 9 which depend therefrom distinguish over the cited reference and are in condition for allowance.

In regard to independent 16 and claims 15 – 19 and 22 which depend therefrom, all rejections are hereby traversed. Claim 16 has been amended to include the limitations of assigning a print job to a selected one of the autonomous cells for completion and dividing the print job into smaller sized lots for concurrent processing by the resources of the selected autonomous cell. The applicants contend that amended claim 16 distinguishes over the cited references. With the added limitation of dividing print jobs within a cell into smaller sized lots for concurrent processing by the resources of the cell, claim 16 distinguishes over Owa et al. by the fact that the printer (a single cell) of Owa et al. cannot concurrently process smaller lots within the single cell. The Owa cell must completely process one print job lot before it can start printing another lot, whereas the autonomous cells of the present application can be printing one lot concurrent with binding another lot and/or shrink wrapping a third lot.

Furthermore, the Office Action cites the combination of Owa et al. and Smirnov et al. as making obvious the claimed subject matter of the present

application. The applicants submit that this is an improper combination. First, there is no motivation to combine the two references. Smirnov et al. fails to teach or fairly suggest the autonomous cells as disclosed into the present application. Smirnov et al. actually teaches away from the claims in that all the resources are interconnected and grouped by the specific process of the resource. This is the opposite of an autonomous cell wherein the resources are grouped such that there is no interdependence between the different cells. The present application discloses autonomous cells wherein a first cell may include a printer, roller and shrink wrapper while a second cell may include a printer, cutter and inserter (see figure 5). Combining Smirnov with Owa destroys the intent of Smirnov et al. that is mapping the print job onto one of the plurality of interconnected paths through the resources.

For at least these reasons, independent claim 16 and claims 17 – 19 and 22 distinguish over the cited references and are in condition for allowance.

**CONCLUSION**

For the reasons detailed above, it is submitted all claims remaining in the application (Claims 1, 3 – 9, 16 – 19 and 22) are now in condition for allowance. The foregoing comments do not require unnecessary additional search or examination.

No additional fee is believed to be required for this Amendment After Final. However, the undersigned attorney of record hereby authorizes the charging of any necessary fees, other than the issue fee, to Xerox Deposit Account No. 24-0037.


In the event the Examiner considers personal contact advantageous to the disposition of this case, he/she is hereby authorized to call Mark S. Svat, at Telephone Number (216) 861-5582.

Respectfully submitted,

FAY, SHARPE, FAGAN,  
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Date

5/19/05

  
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